### **Leadership & Commitment**

## Challenges:

- Financial resources for improvements
- Limited time
- Accountability
- How to message
- Other competing priorities

#### **Best Practices:**

- Messaging
- Tracking appropriate metrics
  - (\$) tangible benefits/consequences
- Projects/initiatives
- Understand what matters know the personalities/values
- Use tools of EMS risks/opportunities

### **Organizational Roles, Responsibilities & Authorities**

## Challenges:

- Culture, part of the job
- Staff turnover
- Competing priorities affect how the job is done
- Managing "out of process"

## **Best Practices**

- Documentation
- Management of change
- Creative communication
- Focus on successes/positives
- Factory presence

## **Compliance Obligations**

#### Challenges:

- Lots of regulations
- Limited staff/time
- Accurate data for reporting
- Changes to operations
- Communication/training staff
- Seems dumb
- Convince management of level of effort

#### **Best Practices**

- Get help!
- Audit/factory presence
- Management of change
- Messages/stickers/SOPs instructions
- Use management responsibilities to communicate
- Information Google. Listserves, newsletters, cyber regulations/BLR, ENHESA, EPA/State

## **Environmental Objectives**

## Challenges

- Resources limited
- Make meaningful to organization
- Outside influences
- Plateaus, finding new objectives
- Changes to operations/new projects
- Get relevant data at right level
- Metrics right ones
- Production/environmental variation
- Other corporate/organization commitments

#### **Best Practices**

- Adapt to specific facility
- Align with organization goals
- Make relevant to staff to engage/implement
- Patience, be strategic, set milestones
- Increase awareness
- Incentives/rewards for ideas

# **Competence & Awareness**

## Challenges:

- Time/resources training
- Effective content
- Planning takes time
- Staff turnover
- So much training! (Fatigue)
- Follow through and accountability
- Changes in job description/duties
- Documenting compliance tracking
- Contractors often overlooked

#### **Best Practices:**

- Food, incentives (Swag)
- Awareness frequent messaging at various levels of organization
- Periodic meetings (targeted)
  - o Include in existing meeting
- Consistent messaging, multiple media, communication plan
- Piggyback on HR/training/safety
- EMS in contracts
- Audits/"floor walk" to identify needs

#### **Documented Information**

# Challenges:

- Control who accesses read/write or read only
- Conflicting retention times
- Organization/standardizing hard to find
- Updating who's responsible for obsolete
- Consistent nomenclature
- Incomplete, missing and incorrect records
- Different formats of documents
- Time/cost of maintaining
- External documents

#### **Best Practices:**

- Change logs
- Assign responsibilities, system for accountability (reminder emails)
- File index
- System with security (control of access)
- Electronic forms for (consistency & control of data)
- Supervisory confirmation of data submission
- Peer audits of reports
- System! (software optional)

## **Operational Planning & Control**

#### Challenges:

- Staff conformance/adherence
- Change
- Unforeseen issues
- Understandable
- Realistic
- Operation changes/mandates
- Resistance to change "that doesn't make sense"

#### **Best Practices:**

- Systematic communication of information & Method
- Communicate importance
- Tie to strategic direction of organization
- Management of change
- Failure mode effects analysis

### **Emergency Preparedness & Response**

# Challenges:

- Functional lack of knowledge
- Conflicting plans
- Updating
- Notification requirements & format
- Coordination with external agencies
- Complete & compliance
- Staff/resources
- Testing

## **Best Practices:**

- Incentives for awareness & readiness
- Training follow
- Exercises & drills/update & improve
- Involve external organizations (tours)
- Response team
- Records

## **Performance Evaluation**

## Challenges:

- Data management
- Normalizing
- Documentation/tracking
- Compliance status metrics
- Communicate results

## **Best Practices:**

- Adapt communication messages to audience
- Compliance Metrics by regulatory program
- Identify trends
- Normalize
- Communicate with top management

## **Internal Audit Program**

# Challenges:

- Time consuming/resource intensive
- Audit results not specific enough
- Identify good auditor independent, trained, etc.
- Repetitive, boring
- Staff participation
- Corporate / organizational culture

#### **Best Practices:**

- Spirit of continuous improvement
- Audit schedule, variation
- Train auditors, have back up
- Share results across facility
- Discussing
- Prepare staff

## **Management Review**

### Challenges:

- Messaging, provide context for information
- Time consuming for organization
- A lot required to communicate
- Provide understandable, meaningful dialog

#### **Best Practices:**

- Spread out meetings
- Provide context
- Substantive topics
- Executive summary (level of detail)
  - o 1 page, bulleted
- Consistent agenda, template
- Documentation and follow ups

# **Nonconformity and Corrective Action**

## Challenges:

- Root cause analysis
- Variability in investigations need input
- Systematic process
- Resources/time
- Effectiveness of corrective actions/timelines

# **Best Practices:**

- Root cause analysis based on criteria (risk)
- Environmental management reviews
- Systematic process (software optional)
- Manageable /sustainable